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January 13, 2023

**- By ECF -**

Honorable Nina R. Morrison  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:** *United States v. Tyler Scott Johnston*  
1:23-cr-00013-NRM-1

**Request to withdraw as counsel and appoint CJA**

Dear Judge Morrison:

Our office represented Mr. Johnston at his Rule 5 presentment, held on January 12, 2023. Mr. Johnston is charged with, *inter alia*, having committed offenses in violation of 18 U.S.C. § 2241(c), *et seq.* An order of detention pending trial was entered against him following his arraignment on the instant indictment. ECF No. 7.

We respectfully seek to withdraw as counsel for Mr. Johnston—at his direct request and with his consent—and ask that the Court assign him defender services pursuant to the Criminal Justice Act (“CJA”) going forward. In connection with this request, a financial affidavit (“CJA-23”) prepared and signed by Mr. Johnston has been filed separately. ECF No. 9 (under seal).

Before we appeared at his presentment, Mr. Johnston claims to have been interviewed by an attorney from the Federal Defenders office and has expressed to us his desire to continue with her services, although no one other than our office has entered an appearance in this matter.<sup>1</sup>

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<sup>1</sup> Upon information and belief, the Assistant Federal Defender is Ms. Leticia M. Olivera, of that organization’s Brooklyn office. We’ve spoken with Ms. Olivera and were left with the impression that she will accept taking on the representation of Mr. Johnston.

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Permitting our withdrawal will not disrupt or delay the prosecution of the case, given that this matter is in its infancy. Further, allowing the Law Office of Robert Tsigler to withdraw would not be disruptive to Mr. Johnston, given that the decision to discharge us and have counsel appointed going forward *is his*. Therefore, withdrawal of our Office from representation of Mr. Johnston is appropriate.

For the reasons stated, I respectfully request that the Law Offices of Robert Tsigler—and myself, of counsel—be allowed to withdraw from representing Mr. Johnston; that our office be removed from the docket and that he be assigned defender services pursuant to the Criminal Justice Act (“CJA”) going forward.

I thank the Court for its attention to this matter.

Respectfully,

/s/ Lane Blossom  
LANE BLESSUM, ESQ.  
LAW OFFICES OF ROBERT TSIGLER  
*lb@tsiglerlaw.com*

Cc: AUSA Margaret Schierberl (via ECF)  
AUSA Tara Brigit McGrath (via ECF)